

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
Atlanta Division**

JENNIFER CHATTMAN,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No.
	)	1:09-CV-1525-GET-ECS
ALPHA RECEIVABLES, INC.	)	
FREDERICK J. HANNA &	)	JURY TRIAL DEMANDED
ASSOCIATES, P.C.	)	
HSBC CARD SERVICES (III) INC.	)	
	)	
Defendants.	)	

**NOTICE TO TAKE DEPOSITION OF FREDERICK J. HANNA &  
ASSOCIATES, P.C. PURSUANT TO O.C.G.A. § 9-11-30(b)(6)**

**DATE:** December 15, 2009

**TO:**

Scot Groghan, Esq.  
Frederick J. Hanna & Associates, P.C.  
1427 Roswell Road  
Marietta, Georgia 30062

1. You are hereby notified that on the 11<sup>th</sup> day of January, 2010, beginning at 1:00 P.M. at the State Bar of Georgia, 104 Marietta Street, NW, I will take the deposition of Alpha Receivables, Inc., an organization in the form of a corporation upon oral examination by a responsible officer or officers designated by said organization pursuant to F.R.C.P. 30(b)(6) , on the matters designated in

**Exhibit “A”** attached hereto. The items designated in **Exhibit “B”** hereto shall be produced by said responsible office or officers at said time and place in connection with said deposition as required by law and pursuant to F.R.C.P. 34. The deposition will be taken before an officer duly authorized by law to take depositions, will be recorded stenographically and/or by audio and/or video recording. The deposition will continue from day to day until its completion.

2. Under the provisions of F.R.C.P. 30(b)(6) the said corporation shall designate an agent or agents who will testify on the above corporation’s behalf as an agent of the corporation with regard to the matters set forth below, in Exhibit “A” hereto, and with respect to the items required to be produced in Exhibit “B” hereto.

3. Pursuant to F.R.C.P. 34, said agent or agents are hereby requested to produce at said deposition the documents set forth in Exhibit “B” hereto.

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Daniel DeWoskin  
Georgia Bar No. 220327  
Attorney for Plaintiff

DeWoskin Law Firm, LLC  
14 Lenox Pointe, NE  
Atlanta, Georgia 30324  
(404) 869-3565

**EXHIBIT “A” TO NOTICE OF PLAINTIFF TO TAKE DEPOSITION OF  
DESIGNATED AGENT OF FREDERICK J. HANNA & ASSOCIATES, P.C.**

**MATTERS ON WHICH EXAMINATION IS REQUESTED**

The matters upon which examination is requested are as follows:

(1) The nature, source of, and identification, authentication of, and explanation of the terms of all documents previously produced and/or submitted by Frederick J. Hanna & Associates, P.C. in connection with:

(a) All pleadings, Discovery requests and responses propounded upon Alpha Receivables, Inc., and other documents filed in Dekalb County State Court Case No. 08A87534-5;

(b) Initial disclosure documents filed by Frederick J. Hanna & Associates, P.C. in the pending federal case filed by Plaintiff;

(2) The nature, source of, and identification, authentication of, and explanation of the terms of documents required to be produced at said deposition pursuant to

F.R.C.P. 30 and 34 as identified below in the DOCUMENTS REQUIRED TO BE PRODUCED PURSUANT TO F.R.C.P. 30 AND 34.

(3) Any documents filed with respect to the pending federal case against Frederick J. Hanna & Associates, P.C. filed by Plaintiff.

(4) Any training conducted by Frederick J. Hanna & Associates, P.C. regarding the Fair Debt Collection Practices Act and the Georgia Fair Business Practices Act.

**EXHIBIT “B” TO NOTICE OF PLAINTIFF TO TAKE DEPOSITION OF  
DESIGNATED AGENT OF FREDERICK J. HANNA & ASSOCIATES, P.C.**

**DOCUMENTS REQUIRED TO BE PRODUCED PURSUANT TO F.R.C.P.**

**30 AND 34**

The deponent is requested to produce the following at deposition pursuant to F.R.C.P. 30 and 34:

- (1) Any and all documents upon which you intend to rely at trial, without regard to your method of reliance at trial.
- (2) Any and all documents provided to you by Alpha Receivables, Inc. as proof it was the Assignee of any account or debt owed by Plaintiff.
- (3) Any and all records, agreements, and/or documents of any kind or nature, and recorded or stored in any form or format which are in the possession of Plaintiff and which relate in any way to the account of Plaintiff, and/or the acquisition of the account of Plaintiff.
- (4) Any letters, emails, or documentation of other communication between Plaintiff and Frederick J. Hanna & Associates, P.C. or Alpha Receivables, Inc.

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HSBC CARD SERVICES (III) INC.	)	
	)	
Defendants.	)	

**CERTIFICATE OF COMPLIANCE**

Pursuant to Local Rule 7.1 (D), counsel hereby files with the Court this Certificate of Compliance. Plaintiff's documents were composed with Times New Roman 14-point font.

[SIGNATURE TO FOLLOW]

Respectfully submitted on the 15<sup>th</sup> day of December, 2009.

**Counsel for Plaintiff:**

/s/ Daniel Eliot DeWoskin  
Daniel Eliot DeWoskin, Esq.  
14 Lenox Pointe, NE  
Atlanta, GA 30324

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HSBC CARD SERVICES (III) INC.	)	
	)	
Defendants.	)	

**CERTIFICATE OF SERVICE**

I hereby certify that on this day I served a true and correct copy of the  
**PLAINTIFF'S NOTICE TO TAKE DEPOSITION OF ALPHA**  
**RECEIVABLES, INC..** upon the following counsel of record via electronic mail  
to:

SCOT GROGHAN, ESQ.  
Georgia Bar No.: 142250  
[Groghan.scot@hannalawoffice.com](mailto:Groghan.scot@hannalawoffice.com)  
1427 Roswell Road  
Marietta, Georgia 30062

JAMES FREANEY, ESQ.  
Georgia Bar No.: 274902  
[Freaney.james@hannalawoffice.com](mailto:Freaney.james@hannalawoffice.com)  
1427 Roswell Road  
Marietta, Georgia 30062

Respectfully submitted on the 15<sup>th</sup> day of December, 2009.

[SIGNATURE TO FOLLOW]

**Counsel for Plaintiff:**

/s/ Daniel Eliot DeWoskin

Daniel Eliot DeWoskin, Esq.

14 Lenox Pointe, NE

Atlanta, GA 30324